

1 Muriel B. Kaplan, Esq. (SBN 124607)
Michele R. Stafford, Esq. (SBN 172509)
2 SALTZMAN & JOHNSON LAW CORPORATION
120 Howard Street, Suite 520
3 San Francisco, CA 94105
(415) 882-7900
4 (415) 882-9287 – Facsimile
mkaplan@sjlawcorp.com
5 mstafford@sjlawcorp.com

6 Attorneys for Plaintiffs

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8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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11 GIL CROSTHWAITE, et al. as Trustees of the
12 OPERATING ENGINEERS HEALTH AND
WELFARE TRUST FUND FOR NORTHERN
13 CALIFORNIA, et al.,

14 Plaintiffs,

15 v.

16 DUN ENGINEERING SERVICES, INC., and
MARK THOMAS JONES,

17 Defendants.
18

Case No.: C07-4995 CRB

**REQUEST TO CONTINUE CASE
MANAGEMENT CONFERENCE**

Date: November 30, 2007

Time: 10:00 a.m.

Judge: Honorable Charles Breyer

19 Plaintiffs hereby request continuance of the Case Management Conference currently set for
20 November 30, 2007 at 10:00 a.m. before the Honorable Charles R. Breyer:

21 1. Defendants have retained counsel, but have not filed a response to the Complaint as
22 of today's date. I provided them with an extension of time to respond so that they could schedule
23 their audit (as requested in the Complaint) with the Trust Funds' auditors.

24 2. The auditors advise that they are waiting for further information from the
25 defendant, and that the audit will be completed shortly.
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**REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE
CASE NO.: C07-4995 CRB**

1 3. I therefore request that the Case Management Conference be continued for
2 approximately 60 days to allow the audit to be completed, and billed to the defendant. I am
3 hopeful that this matter will be resolved without further litigation.

4 Dated: November 20, 2007

SALTZMAN AND JOHNSON
LAW CORPORATION

6
7 By: _____/s/_____
8 Michele R. Stafford, Esq.
9 Attorneys for Plaintiffs

10 IT IS SO ORDERED.

11 The currently set Case Management Conference is hereby continued to
12 _____ at _____, and all previously set deadlines and
13 dates related to this case are vacated, to be reset at that Conference.

14 Date: _____
15 _____
16 United States District Court Judge
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PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 120 Howard Street, Suite 520, San Francisco, California 94105.

On November 20, 2007, I served the following document(s):

REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE

on the interested parties in said action by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

**William Hancock, Esq.
575 E. Locust Ave., Suite 203
Fresno, CA 93720**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 20th day of November, 2007, at San Francisco, California.

_____/s/_____
Vanessa de Fábrega